

March 27, 2004

Dear FCC,

Ref: RM-10867, RM-10868, RM-10869, RM-10870

I would like to request the FCC to eliminate all Element 1 requirements from Part 97 of the FCC Rules and Regulations. My request is in agreement with RM-10870 and in opposition to RM-10867, RM-10868 and RM-10869.

I was first licensed as a Novice in 1957, so I am familiar with the "history" and "issues" of CW. I have a BSEE / MBA and spent my professional life in product design and development in the Communications, Consumer and Industrial product areas. For all practical purposes I hold Element 1 credit and do not stand to gain by it's elimination. However, I can not find any compelling technical argument to retain this element as a requirement in the Amateur Radio Service. As a result I can not support RM-10869 in any manner, shape or form.

I think the ARRL (RM-10867) and NCVEC (RM-10870) make the most sense in terms of 3 classes of licenses, revised spectrum and power levels. These proposals differ in detail but express a common theme of direction to travel in the ultimate decision the FCC could make (just eliminate Element 1 from RM-10867). Personally, I believe that the power levels should be reduced to 100W for General and 50W for Novice everywhere and leave the 1500W for Amateur Extra. In terms of frequencies the Extra's have some premium allocations that should remain. Whereas, Novice and General should be permitted everywhere else with the exception of Novice should be prohibited from operating within 10 KHz (carrier frequency) of band edges below 30 MHz.

RM-10870 makes an excellent point of restricting "Communicator" (I prefer Novice) operators to commercial equipment or commercial kits, and should be included in any decision the FCC makes.

RM-10868 would restrict privileges to 160, 15 and 10 Meters for the "Technician" class and I think that is far too restrictive. Although 160 Meters is ideal for the application, most newcomers do not have room for a *reasonably effective* antenna for 160 Meter frequencies. Nor are they experienced or proficient in the intricacies of antennas, transmission lines and grounds that may be required for these devices. Let the new operators go to frequencies where they can *effectively* experience communications, but limit their power. I have a popular, portable, all band 5 Watt rig as a backup and do not find any problems making contacts with this rig on SSB, PSK31 or FM, perhaps because I listen first! Or maybe it is just my vertical antennas (no beams available!).

The WARC frequencies are obvious by their absence in any of these proposals, and perish the thought that a beginner would *consider* 30 Meters and **have to use CW** or PSK31! These bands are not crowded and offer good opportunities to make contacts with reasonable power – add them to the possibilities above.

Respectfully submitted.

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